

MAYER • BROWN

Mayer Brown LLP
1675 Broadway
New York, New York 10019-5820

Main Tel +1 212 506 2500
Main Fax +1 212 262 1910
www.mayerbrown.com

September 1, 2010

Frederick D. Hyman
Direct Tel +1 212 506 2664
Direct Fax +1 212 849 5664
fhyman@mayerbrown.com

BY UPS NEXT DAY AIR

Honorable Robert E. Gerber
United States Bankruptcy Judge
United States Bankruptcy Court
One Bowling Green
New York, New York 10004-1408

Re: *In re Motors Liquidation Company, et al., f/k/a General Motors Corp.,
et al, Chapter 11 Case No. 09-50026*

Dear Judge Gerber:

This firm is counsel to Bayerische Motoren Werke Aktiengesellschaft (“BMW”). We recently filed BMW’s (i) Objection to Part II of the Motion of Debtors Pursuant to Sections 105, 363 and 365 of the Bankruptcy Code for an Order Authorizing (I) the Debtors to Enter into a Stock Purchase Agreement with General Motors Holdings, S.L., and (II) the Assumption and Assignment of the BMW Contract in Connection with the Debtors’ Entry into the Stock Purchase Agreement, dated August 13, 2010, and (ii) the Declaration of Dr. Johann Wieland attached thereto as Exhibit A (the “Objection”).

Before filing the Objection, we reached out to debtor’s counsel, Weil, Gotshal & Manges LLP, to notify them that we believe an evidentiary hearing is necessary at a later date, but were unable to reach counsel. We contacted debtor’s counsel today, and while they agreed that the September 7, 2010 hearing will not be an evidentiary hearing, debtor’s counsel did not consent to an evidentiary hearing at a later date. Unable to resolve this disagreement, we contacted the Courtroom Deputy, Helene Blum. She recommended that we file a letter informing the Court of our request for an evidentiary hearing. Therefore, pursuant to Case Management Order #1, ¶ 3 and Southern District of New York Bankruptcy Local Rule 9014-2, we respectfully request that this Court schedule an evidentiary hearing on a date that allows sufficient time for BMW witnesses (all of whom are located in Germany) to travel to New York and, to the extent necessary, the translation of German-language documents.

Honorable Robert E. Gerber
September 1, 2010
Page 2

Your chambers should feel free to contact the undersigned with any questions or concerns.

Respectfully submitted,

/s/ Frederick D. Hyman
Frederick D. Hyman

cc: Harvey R. Miller, Esq. (*via UPS Next Day Air*)
Stephen Karotkin, Esq. (*via UPS Next Day Air*)
Joseph H. Smolinsky, Esq. (*via UPS Next Day Air*)
Tracy Hope Davis, Esq. (*via UPS Next Day Air*)